NASS-2026-0001 | Comment 1 of 5 — Burden & Lifecycle

Docket: NASS-2026-0001 | OMB 0535-0088

Re: Objective Yield Surveys

Agency: USDA / National Agricultural Statistics Service

Submitted: March 16, 2026

Submitted by:

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Thomasville, Thomas County, Georgia | 14-Patent Portfolio: Cybersecurity, Quantum Comms, Autonomous Systems

I. Burden — 15x Variance Range Is Statistically Uninterpretable

NASS estimates 2–30 minutes per respondent — a 15x difference — across 12,550 respondents for 3,100 annual hours. NASS has provided no information about how respondents distribute across this range, how variance correlates with crop type, what proportion of the total is driven by high-burden vs. low-burden respondents, or how burden differs between initial-season enrollment and recurring visits. The estimate is statistically uninterpretable as currently disclosed.

- NASS must publish a disaggregated burden estimate by crop type, survey cycle visit, and farm size

II. Lifecycle — Multi-Visit Program Not Estimated

NASS's Objective Yield methodology involves multiple field plot visits across the growing season: initial plot layout and enrollment (farmer coordination required), 4–6 periodic mid-season visits for counts and measurements (15–30 min coordination each), and end-of-season production reconciliation. Cumulative annual burden for enrolled corn or soybean farmers: 60–180 minutes — 2x to 6x the stated 30-minute maximum — before accounting for enrollment coordination.

- NASS must estimate full seasonal lifecycle burden per enrolled respondent, not single-contact burden

Requested: Disaggregated burden by crop type, survey visit number, and farm size. Full seasonal lifecycle total required.

NASS-2026-0001 | Comment 2 of 5 — Methodology, Cost & Economic Impact

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III. Methodology — No Sampling Frame or Response Rate Disclosed

NASS randomly selects sample fields but does not disclose: the sampling frame and identification methodology, participation rates and non-response bias analysis, geographic distribution relative to production concentration, or how cooperative agreement state surveys (citrus, almonds, walnuts, hazelnuts) integrate with national sampling design. For a survey directly informing publicly released USDA crop reports that move commodity markets, this absence of methodology disclosure is a critical gap.

IV. Cost Reality — Field Access and Coordination Costs

NASS states no cost beyond time. For enrolled Objective Yield farmers, real costs include: coordination of field access for NASS enumerators during active growing season operations, potential crop damage from plot layout and measurement activities, opportunity cost of farmer presence during visits, and legal review of NASS data collection agreements in some cases. These are excluded from NASS's burden disclosure.

V. Economic Impact — Thomas County Regional Stakes

Obelisk Tech Systems is headquartered in Thomas County, Georgia with generational family land in the region. Southwest Georgia farmers participate in USDA agricultural programs and bear the cumulative burden from FSA, RMA, NASS, and state agencies simultaneously. Corrected seasonal burden (60–180 min annually) across 12,550 respondents = 12,550–37,650 actual burden hours vs. the stated 3,100 hours — a 4x to 12x understatement with direct regional impact.

Requested: Publish sampling frame and response rate; produce crop-type and farm-size disaggregated burden estimate; estimate field access costs.

NASS-2026-0001 | Comment 3 of 5 — Practical Utility, Duplication & Statutory

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VI. Practical Utility — Forecast Accuracy Not Validated

NASS does not disclose: the historical accuracy of Objective Yield forecasts relative to final production estimates, the marginal contribution of field plot data versus satellite imagery and precision agriculture data, or whether plot measurements are incorporated into final estimates or superseded by other sources. If precision agriculture and remote sensing data provides equivalent forecast accuracy, the 3,100-hour annual respondent burden may be entirely unnecessary for the program's stated statistical purpose.

- NASS must publish a forecast accuracy validation study before OMB renewal

VII. Duplication — FSA, RMA, State Agricultural Data

Field-level production data is reported to FSA (CCC-576 and acreage reports), RMA (APH production history), and state departments of agriculture under cooperative programs. NASS has not conducted a systematic crosswalk against these overlapping requirements. Thomas County, Georgia farmers submit overlapping production data to FSA, RMA, and NASS simultaneously.

VIII. Cross-Agency — Precision Agriculture Platform Data

John Deere Operations Center, Climate FieldView, Granular, and AgriWebb aggregate yield, planting, and field management data for millions of enrolled U.S. farm fields in structured electronic formats. NASS has established zero data-sharing agreements with any precision agriculture platform provider despite the obvious relevance of their data to the Objective Yield program.

- John Deere alone has field-level yield data for millions of U.S. acres directly relevant to NASS Objective Yield programs

IX. Statutory — Cooperative Agreement Scope

Fruit and nut surveys conducted under state-reimbursed cooperative agreements may require separate state-level authorization. NASS should clarify whether OMB PRA authority extends to collection conducted under state-reimbursed cooperative agreements.

Requested: Publish forecast accuracy validation; conduct FSA/RMA crosswalk; establish precision agriculture platform data-sharing pilot.

NASS-2026-0001 | Comment 4 of 5 — Technology, Interoperability & COTS

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X. Technology Failure — Manual Plot Visits When Precision Ag Data Exists

NASS Objective Yield surveys rely on NASS enumerators conducting physical plot measurements — a methodology from the mid-20th century. Modern commodity farms use GPS yield monitors (field-level yield maps), drone imagery (stand count and canopy density), satellite NDVI monitoring (crop development), and precision planting systems (digital plant population records). NASS has evaluated none of these as alternatives to manual plot visits.

- Manual plot visit methodology is indefensible when equivalent electronic data exists in precision agriculture platforms

XI. Interoperability — NASS Disconnected from USDA Precision Ag Infrastructure

USDA has made significant investments in precision agriculture data infrastructure through FSA, ERS, and the USDA Agricultural Data Commons. NASS Objective Yield operates in isolation — manual plot data cannot be cross-validated against precision agriculture data in USDA's own systems. NASS should develop an interoperability roadmap connecting Objective Yield to USDA's precision agriculture data infrastructure.

XII. Pilot Testing

NASS has not disclosed whether it has piloted remote sensing, drone imagery, or precision agriculture data feeds as alternatives to manual plot visits for any Objective Yield crop program. A remote sensing pilot for corn or soybeans should be completed before OMB renewal.

XIII. COTS Solution

Precision agriculture platform data-sharing agreements with John Deere, Climate FieldView, and Granular would provide NASS with field-level yield, stand count, and crop development data for millions of enrolled U.S. farm acres at zero respondent burden. Commercial remote sensing analytics platforms provide satellite and drone-based yield estimation at low cost. These COTS alternatives should replace manual plot visits for technologically equipped farms.

Requested: Precision agriculture platform data-sharing pilot with one major provider; remote sensing alternative evaluation for corn/soybean program; NASS modernization roadmap.

NASS-2026-0001 | Comment 5 of 5 — Small Business, Security, Quality, Drag & Recordkeeping

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XIV. Small Business — Southwest Georgia Family Farm Burden

Thomas County, Georgia family farms — including operations on generational family land — face cumulative regulatory reporting burden from FSA, RMA, NASS, and state agencies simultaneously. The 60–180 minute seasonal burden of Objective Yield falls disproportionately on small family farm operations without dedicated administrative staff. NASS must produce a Regulatory Flexibility Act analysis for small and beginning farmer respondents.

XV. Beginning Farmer Barrier

Objective Yield enrollment is effectively mandatory for randomly selected farms. For beginning farmers with limited federal program experience, multi-visit NASS survey enrollment creates an administrative burden barrier disproportionately affecting new entrants to U.S. commodity farming. NASS should develop a streamlined participation pathway for beginning farmers.

XVI. Data Security — Precision Ag Integration Security

Any data-sharing arrangement with precision agriculture platform providers would involve farm-level production data that is commercially sensitive. NASS must develop a farmer data rights and security framework addressing: farmer consent and data rights, encryption for field-level data transmission, access controls, and third-party platform security requirements before any data-sharing program.

XVII. Data Quality — Respondent Fatigue in Multi-Survey Farming Households

Farm operators enrolled in NASS Objective Yield simultaneously face FSA acreage reporting, RMA production history, state agricultural surveys, and multiple other federal collections. Cumulative reporting fatigue produces less careful plot observations, estimated rather than measured values, and less accurate end-of-season reconciliation. The Objective Yield data quality problem cannot be solved without addressing cumulative federal agricultural reporting burden.

XVIII. Operational Drag — Plot Visits During Peak Operations

Growing season plot visits occur during maximum operational complexity. NASS should implement advance scheduling allowing enrolled farmers to designate preferred lower-intensity windows for enumerator visits.

XIX–XX. Multi-Agency Pattern & Recordkeeping

NASS surveys across cotton, objective yield, and other commodity programs consistently exhibit manual collection where automated data exists — requiring OIRA-directed modernization. Additionally, farmers maintain NASS-verifiable field records creating recordkeeping burden entirely

excluded from the 2–30 minute estimate and required to be estimated and disclosed under 44 U.S.C. 3502(2).

Requested: RFA small/beginning farmer analysis; precision ag data integration security framework; advance scheduling system for plot visits; OIRA-directed NASS modernization mandate.